



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

December 13, 2016

Sue Sharp
Sharp's Dry Cleaning LLC
1324 East 10th Street
Jeffersonville, IN 47130

Dear Ms. Sharp:

Re: Remediation Investigation
Plan
Sharp's Dry Cleaning
1324 East 10th Street
Jeffersonville, IN 47130
VRP # 6160304

The Indiana Department of Environmental Management (IDEM) has reviewed the Remediation Investigation Plan (RIP) (Ramboll, September 12, 2016). The plan was uploaded to the IDEM Virtual File Cabinet (VFC) as document #80351646. Further site history can be found in the VFC located on the IDEM website www.idem.in.gov. This technical letter contains a brief background summary including comments generated during our review of the above mentioned plan.

Background

The Site is an active dry cleaning facility located at 1324 East 10th Street, which is located near the center of Jeffersonville, Indiana. The Site is developed as commercial property, and is located in a mixed-use commercial/residential area in Jeffersonville. The Site property is approximately 153 feet by 90 feet in size, which is about 0.32 acres. The one-story Site building is approximately 65 feet by 40 feet and the remainder of the property is covered with asphalt. A covered drop off area is located on the northern side of the building.

Historical records indicate that a gasoline service station was present at the Site from as early as 1950 to the mid 1960s. A dry cleaning operation has been present at the Site since the early 1970s. The dry cleaning facility was originally owned and operated by Herman Clark as Clarks One Hour Martinizing Cleaners. Sue Sharp purchased the facility in 1988 and operated it as Sharp's One Hour Martinizing and more recently as Sharp Cleaners. The dry cleaning operation is located in the former service station building. Site investigations have determined that there are no petroleum-related contaminants of concern (COCs) above applicable screening levels from the former service station operation.



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Originally, dry cleaning was conducted in a transfer machine. A dry to dry machine was installed in 1989. The dry cleaning equipment has reportedly always been located in the same general area. A spill of tetrachloroethene (PCE) reportedly occurred at the facility in 1986, during ownership and operation of the facility by Herman Clark. A hose reportedly broke on the transfer machine present at the time and released PCE to the floor. The fire department was called to the Site and reportedly washed the PCE across the floor and out one of the overhead doors located on the front of the building. The quantity of PCE released is not known. The Site had been in the State Cleanup Program since 2006 (SC# 0000244) and was enrolled in the Voluntary Remediation Program (VRP) in June 14, 2016.

Remediation is to be evaluated according to the 2016 Remediation Closure Guide (RCG). Approximately 270 tons of source area soil have been removed. Soil Vapor Extraction (SVE) was conducted from July 2014 to July 2015. The Federal property located northwest of the site is occupied by the U.S. Census Bureau along 10th Street, and by several industries on the northern portion of the property. The U.S. Census Bureau had three water supply wells in which PCE had been detected. According to the IDEM State Cleanup files, pumping from these wells ceased in December 2014, and the water users were switched to City water.

Comments

1. IDEM acknowledges that as an active dry cleaner Occupational Safety and Health Administration (OSHA) permissible exposure limits (PELs) would apply if PCE or TCE are currently used as part of the drycleaning processes. However, the applicant is required to clarify if PCE and/or trichlorethene (TCE) are actively used in on-site processes in order to determine if a Vapor Intrusion (VI) evaluation is currently needed, or can be delayed until chlorinated solvent is not actively used at the structure, or building/land use changes.
2. Indoor air and sub-slab air samples were collected from the adjacent property, Enterprise Rent-a-car, 1314 E. 10th Street, in September 2015. There were no screening level exceedances during the sampling event during summer worst case conditions. The plan states that the second VI sampling event after the shutdown of the SVE system at the site in March 2016 was representative of winter heating season conditions. During the March 2016 sampling event, the PCE subslab concentration (6790 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)) exceeded the screening level (6000 $\mu\text{g}/\text{m}^3$) and the indoor air PCE concentration (176 $\mu\text{g}/\text{m}^3$) was below the commercial screening level (180 $\mu\text{g}/\text{m}^3$). The applicant is required to provide additional lines of evidence to support winter worst case conditions as the general air temperature in the region was almost a high of 70F on the day of the sampling event, so the HVAC system may not have been operating. The applicant states that they will follow IDEM guidance and sample again during winter worst case conditions. IDEM concurs that another round of sampling is appropriate.
3. There still may be off-site receptors that need to be addressed or evaluated based on recent June 2016 groundwater vapor intrusion groundwater screening levels (VIGWSL) exceedances at the following monitoring wells:

- on-site MW-10 (PCE: 296 micrograms per liter (µg/L) and TCE: 16.3 µg/L) to below VIGWSL off-site across the street at MW-5
- off-site MW-12 (PCE: 243 µg/L; TCE: 17.7 µg/L)
- off-site MW-13D (PCE: 83.3 µg/L and TCE 60.9 µg/L) downgradient of MW-10

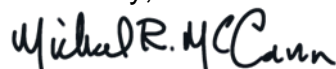
The receptors are required to be identified and an evaluation made based on IDEM VI guidance. A preferential pathway evaluation also is required to be conducted.

4. The investigation plan proposes to continue groundwater monitoring. This is acceptable. However, groundwater characterization is not complete. The applicant is required to:
 - Delineate groundwater contamination to the west along the 10th Street utility corridor.
 - Delineate groundwater contamination to the north and west of monitoring wells MW-5 and MW-13D. Delineation will have to take into account horizontal as well as vertical delineation (nested wells).

Please respond within 30 days of the receipt of this letter with a plan or scope of work to address these comments.

If you have any questions or concerns, please contact me at (317) 233-5298 or at mmccann@idem.IN.gov.

Sincerely,



Michael R. McCann,
Project Manager
Voluntary Remediation Program
Office of Land Quality

cc: Corey Webb, Section Chief
Andrew Gremos, Ramboll Environ., One Indiana Square, Suite 2335,
Indianapolis, IN 46204

It is the goal of IDEM to enable remediation sites to move forward in a timely manner. If an impasse has been reached over technical issues, a Technical Review Panel of non OLQ scientists is available to review and offer a non-binding opinion to help resolve technical disagreements with the VRP and State Cleanup Program project managers. The goal is to facilitate progress at your site. This review process is available immediately. If you would like to request a review by the Panel, please contact Bruce Oertel, Branch Chief, Remediation Services Branch, OLQ at (317) 232-4535 or boertel@idem.in.gov.

Any decision produced by the Technical Review Panel is not an agency action as defined in IC § 4-21.5-1-4 or an order as defined in IC § 4-21.5-1-9. This decision is not subject to administrative review because it is not a determination of any legal rights, duties, privileges, immunities, or other legal interests, and because it is issued pursuant to an informal procedure for dispute resolution as allowed by IC 4-21.5-3-34 (a).